

REMARKS

The present application includes pending claims 1-25, all of which have been rejected. By this Amendment, claims 1-5, 7, 9, 11-16, 18, 20 and 21-23 have been amended. New claims 26-36 have been added. The Applicants respectfully submit that the pending claims define patentable subject matter.

The specification was objected to due to missing information in paragraph [0002]. This paragraph has been amended to overcome this objection.

Claims 1-20 were objected to because of minor informalities. The claims have been amended to overcome these claim objections.

Claims 22 and 23 were rejected under 35 U.S.C. 112, second paragraph, because claims 22 and 23, which depend from claim 21, recites "the system." Claims 22 and 23 have been amended to recite the "method."

Claims 22 and 23 were rejected under 35 U.S.C. 101 because the Office Action stated that the "claims are directed to software per se." See February 20, 2007 Office Action at page 4. However, these claims, as amended, are directed to a "method of supporting the management of multimedia display content in a communication network." Thus, the Applicants respectfully request reconsideration of these claim rejections.

Claims 1-24 stand rejected under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 7,065,778 ("Lu"). Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lu in view of United States Patent No. 6,477,708 ("Sawa"). The Applicants respectfully traverse these rejections for at least the following reasons.

I. Lu Does Not Anticipate Claims 1-11

Lu “relates to the field of utilizing personalized video recorders and other similar types of devices to distribute television programming.” *See* Lu at column 1, lines 7-11. In particular, Lu discloses a system in which a user is able to record a show that is transmitted in another broadcast area. *See id.* at Abstract.

For example, Lu describes the following:

Specifically, personalized video recorder 200 is coupled to the Internet 302 such that it can receive an electronic programming guide (EPG) containing worldwide television programming from an EPG server computer 304. The user of personalized video recorder 200 utilizes the EPG to request delivery of a specific television show that may not be available to him or her. Upon reception of the request from personalized video recorder 200, EPG server computer 304 locates via Internet 302 one or more personalized video recorders... situated within a broadcast region of the requested television show. Subsequently, EPG server computer 304 programs one or more personalized video recorders... to record the requested television show when it is broadcast by a television content provider.... Once the personalized video recorders... record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requested personalized video recorder 200. In this manner, the present embodiment enables personalized video recorder 200 to order and receive specific television shows that are unavailable from its television content provider....

Lu at column 6, lines 39-61. Thus, Lu discloses a system in which a user sends a recording request that is received by a server computer via the Internet. The server computer then locates a recorder within the broadcast region of the show, and then sends the recorded show back to the requesting user.

A. A User Interface Supporting The Selection And Scheduling Of Media Delivery To A Second Location

Lu does not describe, teach, or suggest a “user interface supporting the selection and scheduling of media delivery to a **second location**,” as recited in claim 1. The Office Action cites Lu at column 6, lines 43-45 and 50-54 as disclosing this limitation. These portions of Lu recite, however, the following:

The user of personalized video recorder 200 utilizes the EPG [electronic programming guide] to request delivery of a specific television show that may not be available to him or her.

* * *

Subsequently, EPG server computer 304 programs one or more personalized video recorders (e.g., 200A and/or 200B) to record the requested television show when it is broadcast by a television content provider (e.g., television head-end 308).

Lu at column 6, lines 43-54. Thus, in Lu, the user requests delivery for a television show at his/her location through the EPG. The EPG then arbitrarily locates a PVR in another area to record the show. After the show is recorded, the show is sent to the user at his/her location. That is, selection and delivery of the show occurs at a single location. This passage of Lu does not describe, teach, or suggest, however, a “user interface supporting the selection and scheduling of media delivery to a **second location**,” as recited in claim 1. Thus, for at least this reason, the Office Action has not established a prima facie case of anticipation with respect to claims 1-11.

B. Receiving A Request Identifying One Of The First And Second Associated Network Addresses, And Responding By Identifying The Other Of The Associated First And Second Network Addresses

Claim 1 also recites, in part, “server software that receives a **request identifying** one of the associated first and second associated network addresses and that **responds by identifying**

the other of the associated first and second network addresses to support delivery....” Lu does not describe, teach, or suggest such limitations. Instead, Lu merely discloses that a user of a PVR requests delivery of a specific television show, at which point a server computer arbitrarily locates another PVR in a particular broadcast area to record the show for the requesting PVR.

The Office Action cites Lu at column 10, lines 10-15 as disclosing a request that “identifies one of the associated first and second network protocol addresses.” *See* February 20, 2007 Office Action at page 6. This portion of Lu states, however, the following:

Furthermore, the programming instructions of step 512 may also include an Internet Protocol (IP) address of a device (e.g., personalized video recorder 200) that the personalized video recorder (e.g., 200A or 200B) should transmit the requested television show to once it has been recorded.

Lu at column 10, lines 10-15. This portion of Lu merely indicates the IP address of the location in which the recorded show will be sent. This portion of Lu does not, however, describe, teach or suggest “server software that receives a **request identifying** one of the associated first and second associated network addresses and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1. Thus, for at least this reason, the Office Action has not established a prima facie case of anticipation with respect to claims 1-11.

Additionally, the Office Action cites Lu at column 6, lines 45-50 as disclosing “respond[ing] to a request that identifies one of the associated first and second network addresses] by identifying the other of the associated first and second network addresses” *See* February 20, 2007 Office Action at page 6. This portion of Lu recites, however, the following:

Upon reception of the request from personalized video recorder 200, EPG server computer **locates** via Internet 302 one or more personalized video recorders (e.g., 200A and/or 200B) situated within a broadcast region of the requested television show.

See Lu at column 6, lines 45-50. The “request” mentioned in this passage is a “request [for] delivery of a specific television show that may not be available to him or her.” *See id.* at column 6, lines 43-45. A request for delivery of a specific television show that may not be available to a person is not a “request that identifies one of the associated first and second network addresses.” Moreover, in response to the request for delivery, Lu discloses that the EPG server “locates one or more personalized video recorders situated within a broadcast region of the requested television show.” Location of a recorder within a particular broadcast region in response to a request for delivery of a particular television show is not a response to a request that identifies one of the associated first and second network addresses that “identif[ies] the other of the associated first and second network addresses to support delivery,” as recited in claim 1. Thus, for at least this reason, the Office Action has not established a *prima facie* case of anticipation with respect to claims 1-11.

For at least the reasons discussed above, the Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation with respect to claims 1-11. Indeed, Lu does not anticipate claims 1-11 for at least the reasons discussed above.

II. Lu Does Not Anticipate Claims 12-20

The Applicants now turn to claim 12, which recites, in part, “a user interface, at the first location, having at least one view comprising a representation of media available for consumption, the user interface supporting the selection and scheduling of media for delivery at

a second location.” Lu does not anticipate claims 12-20 for at least the reasons discussed above in Section I.A.

Additionally, claim 19 recites, in part, “wherein the at least one multimedia display comprises: at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed.” The Office Action cites column 6, lines 8-17 of Lu as disclosing this limitation. However, this portion of Lu states the following:

Additionally, the personalized video recorder 200 of FIG. 2 can include an optional remote control device 216 (e.g., a universal remote control device having a number of buttons, dials, etc.) which is communicatively coupled to bus 210 for communicating user input information and command selections to the central processor(s) 202. It is appreciated that remote control device 216 may be implemented with the capability to communicate with personalized video recorder 200 utilizing wireless communication (e.g., infrared signaling).

Lu at column 6, lines 8-17. This portion of Lu merely discloses a remote control that may be used with the PVR. Remote controls transmit signals to a device to operate the device, etc. Lu does not disclose that the remote control itself receives any signals or “detects” anything. In short, nothing in this passage describes, teaches, or suggests “at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed,” as recited in claim 19. Thus, for at least this additional reason, the Office Action has not established a prima facie case of anticipation with respect to claim 19.

III. Lu Does Not Anticipate Claims 21-24

Claim 21 recites, in part, “scheduling media for delivery from a first location to a second location based on input from the user at the second location.” Lu does not anticipate claims 21-24 for at least the reasons discussed above in Section I.A.

IV. The Proposed Combination Of Lu And Sawa Does Not Render Claim 25 Unpatentable

The Applicants respectfully submit that the proposed combination of Lu and Sawa does not render claim 25 unpatentable for at least the reasons discussed above in Section III.

V. New Claims 26-35 Are In Condition For Allowance

New claims 25-35 have been added. These claims should be in condition for allowance over the cited references for at least the reasons discussed above in Section I.B. The fee for these new claims is calculated as follows:

11 additional claims in excess of 20 X \$50/claims = \$550

1 additional independent claim in excess of 3 X \$200 = \$200

TOTAL = \$750

VI. Conclusion

In general, the Office Action makes various statements regarding claims 1-25 and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. However, the Applicants expressly reserve the right to challenge such statements in the future should the need arise (e.g., if such statement should become relevant by appearing in a rejection of any current or future claim).

The Applicants respectfully submit that the Office Action has not established a prima facie case of anticipation or obviousness with respect to any of the pending claims for at least the reasons discussed above and request that the outstanding rejections be reconsidered and withdrawn. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the Applicants.

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Amendment Under 37 C.F.R. § 1.111
April 30, 2007

The Commissioner is authorized to charge any necessary fees, including the \$750 fee for new claims 26-36, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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